



Government of the District of Columbia
Vincent C. Gray, Mayor
Department of Insurance, Securities and Banking



William P. White
Commissioner

**BEFORE THE
INSURANCE COMMISSIONER OF
THE DISTRICT OF COLUMBIA**

Re: Report on Examination - **CARE Risk Retention Group, Inc.**, as of December 31, 2011

ORDER

An Examination of **CARE Risk Retention Group, Inc.**, as of December 31, 2011 has been conducted by the District of Columbia Department of Insurance, Securities and Banking ("the Department").

It is hereby ordered on this 13th day of June, 2013, that the attached financial condition examination report be adopted and filed as an official record of this Department.

Pursuant to Section 31-1404(d)(1) of the D.C. Official Code, this Order is considered a final administrative decision and may be appealed pursuant to Section 31-4332 of the D.C. Official Code.

Pursuant to Section 31-1404(d)(1) of the D.C. Official Code, within 30 days of the issuance of the adopted report, the company shall file affidavits executed by each of its directors stating under oath that they have received a copy of the adopted report and related order.

Pursuant to Section 31-1404(e)(1) of the D.C. Official Code, the Department will continue to hold the content of the report as private and confidential information for a period of 10 days from the date of this Order.



William P. White
Commissioner

GOVERNMENT OF THE DISTRICT OF COLUMBIA

DEPARTMENT OF INSURANCE, SECURITIES AND BANKING



REPORT ON EXAMINATION

CARE RISK RETENTION GROUP, INC.

AS OF

DECEMBER 31, 2011

NAIC NUMBER 11825

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Washington, D.C.
April 18, 2012

Honorable William P. White
Commissioner
Department of Insurance, Securities and Banking
Government of the District of Columbia
810 First Street, NE, Suite 701
Washington, D.C. 20002

Dear Commissioner White:

In accordance with Section 31-3931.14 of the District of Columbia Official Code, we have examined the financial condition and activities of

CARE Risk Retention Group, Inc.

hereinafter referred to as the “Company” or “CARE”, located at the office of the Company’s captive manager, 58 East View Lane, Suite 2, Barre, Vermont 05641.

SCOPE OF EXAMINATION

This full-scope examination, covering the period from January 1, 2007 through December 31, 2011, including any material transactions and/or events noted occurring subsequent to December 31, 2011, was conducted by examiners of the District of Columbia Department of Insurance, Securities and Banking (“the Department”). The last examination was completed as of December 31, 2006 by the Department.

We conducted our examination in accordance with the NAIC Financial Condition Examiners Handbook (“Handbook”) and the policies and standards established by the Department. The Handbook requires that we plan and perform the examination to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company, including corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. The examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation, management’s compliance with Statutory Accounting Principles, annual statement instructions, and compliance with domestic jurisdiction laws and regulations.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. In addition, our examination included tests to provide reasonable assurance that the Company was in compliance with applicable laws, rules and regulations. In planning and conducting our examination, we gave consideration to the concepts of materiality and risk, and our examination efforts were directed accordingly.

The Company was audited annually by an independent public accounting firm. The firm expressed unqualified opinions on the Company's financial statements for the calendar years 2007 through 2011. We placed substantial reliance on the audited financial statements for calendar years 2007 through 2010, and consequently performed only minimal testing for those periods. We concentrated our examination efforts on the year ended December 31, 2011. We obtained and reviewed the working papers prepared by the independent public accounting firm related to the audit for the year ended December 31, 2011. We placed reliance on the work of the auditor and directed our efforts, to the extent practical, to those areas not covered by the firm's work papers.

SUMMARY OF SIGNIFICANT FINDINGS

The results of this examination disclosed no material adverse findings, significant non-compliance findings, or material changes in financial statements.

STATUS OF PRIOR EXAMINATION FINDINGS

A full scope financial examination was conducted by the Department as of December 31, 2006 which covered the period November 3, 2003 through December 31, 2006. In the Report on the prior examination, dated January 7, 2008, the Department noted several exception conditions and related recommendations. Our examination included a review to determine the current status of the recommendations in the prior exam report, and determined that the Company had satisfactorily addressed these recommendations.

HISTORY

General:

CARE was incorporated as an association captive insurance company operating as a risk retention group under the captive insurance laws of the District of Columbia on November 3, 2003 and commenced operations on January 1, 2004. The Company is a stock insurance company capitalized by CARE Professional Liability Association, LLC ("CPLA"), a Kentucky based for-profit association. CARE writes medical professional liability policies for physicians and surgeons who are eligible members of CPLA.

Membership:

CPLA is the 100 percent owner of CARE with 1,000,000 shares of common stock at a par value of \$1 per share.

Dividends and Distributions:

No dividends or other distributions to its member have been declared or paid since the Company was incorporated.

MANAGEMENT

Board of Director and Officers:

The following persons were serving as the Company's directors as of December 31, 2011:

<u>Name and State of Residence</u>	<u>Principal Occupation</u>
Daniel L. Hafendorfer, M.D. Kentucky	Physician, practitioner Haller, Hazlett & Adams
Robert Pope, M.D. Georgia	Vice President of Clinical Innovation Humana, Inc.
Michael T. Rogers Florida	President & CEO Risk Services, LLC

The following persons were serving as the Company's officers as of December 31, 2011:

<u>Name</u>	<u>Position</u>
Daniel L. Hafendorfer, M.D.	President
Robert Pope, M.D.	Vice-President
Michael T. Rogers	Treasurer
Gregory Cook	Assistant Treasurer
Heather Ross	Secretary

Committees:

As of December 31, 2011, the Company's board of directors had not established any committees.

Conflicts of Interest:

The Company has an established procedure for the disclosure of any material interests or affiliations on the part of its directors and officers. Our review of the conflict of interest statements signed by the Company's directors and officers for the period under examination disclosed no conflicts that would adversely affect the Company. Furthermore, no additional conflicts of interest were identified during our examination.

Corporate Records:

We reviewed the minutes of the meetings of the board of directors and members for the period under examination. Based on our review, it appears that the minutes have documented the board of director's review and approval of the Company's significant transactions and events, as required by the Company bylaws.

CAPTIVE MANAGER

Risk Services, LLC ("Risk Services") has been the Company's captive manager since inception, and provides captive management services including regulatory services and accounting services to the Company. In addition, Risk Services has its own legal counsel on staff that provides basic legal advice to CARE.

AFFILIATED PARTIES AND TRANSACTIONS

As indicated in the "Membership" section of this report, the Company is 100 percent owned by CARE Professional Liability Association, LLC ("CPLA").

During the period under examination, CPLA was responsible for the collection and remittance of premiums, preparation of the bordereaux and oversight of claims. Effective December 15, 2007, the amended Program Services Agreement (the "Agreement"), between the Company and CPLA will pay CPLA a base commission rate for new and renewal business as well as profit commissions.

Claim services are provided by Avalon Claim Services, located in Columbus, Ohio on behalf of CPLA for an annual service fee. An additional flat service fee per reported claim/litigation shall be applied should more than 55 asserted claims/litigations be reported within a contract year.

FIDELITY BOND AND OTHER INSURANCE

The Company does not have any employees and does not carry fidelity bond coverage. The Program Manager, CPLA has fidelity bond coverage in the amount of \$2,000,000. The coverage exceeds the minimum amount of coverage recommended by the NAIC.

The Company is a named insured on a Directors and Officers policy maintained by CPLA. The coverage exceeds the minimum amount of coverage recommended by the NAIC.

PENSION AND INSURANCE PLANS

The Company has no employees and therefore has no employee pension or insurance plans.

TERRITORY AND PLAN OF OPERATION

As of December 31, 2011, the Company was licensed in the District of Columbia, and was registered as a risk retention group in the following 31 states: Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Kentucky, Maine, Maryland, Michigan, Minnesota, Montana, Nevada, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, South Dakota, Tennessee, Texas, Vermont, Virginia and West Virginia.

During 2011, CARE wrote premiums of approximately \$4.8 million. Approximately 83 percent of the premiums were written in the following seven (7) states: Florida (22 percent), New York (15 percent), California (12 percent), Texas (12 percent), Kentucky (10 percent), Delaware (7 percent) and Indiana (5 percent). As of December 31, 2011, the Company did not actively write policies in the following registered states: Arkansas, Colorado, Connecticut, Hawaii, Idaho, Maine, Montana, South Dakota and Vermont.

CARE offers medical professional liability insurance on a claim asserted policy form, which differs from some claims made policies in that it covers only claims asserted by third parties during the policy period, rather than all incidents reported during the policy period. Policy limits up to \$1.3 million per occurrence/\$3.9 million annual policy aggregate are available. A \$15,000 deductible applies to most policies. A small number of policies have deductibles ranging from zero to \$50,000. Allocated loss adjustment expenses (ALAE) are included within the limits and within the \$15,000 deductible. Policies are offered on a first year through fifth year (fully mature) basis.

The Company had no employees and its daily business operations were managed by various affiliated and unaffiliated service providers. During the examination period and as of the date of this report, the Company's operations were located at the offices of its owner, CPLA, in Louisville, Kentucky, and at the offices of its captive manager, Risk Services, in Barre, Vermont. Underwriting was conducted at the offices of the Company's program manager, CPLA. Claims were handled by a third party claims administrator located in Ohio.

COMPARATIVE FINANCIAL POSITION OF THE COMPANY

The financial position of the Company and its loss experience for the years under examination is presented in the following table, which is prepared from information contained in the Company's annual statements filed with the Department. The amounts reported in the table for the year ended December 31, 2011 are determined by this examination.

	2011	2010	2009	2008	2007
Total admitted assets**	\$ 11,783,694	\$ 33,339,526	\$ 35,604,463	\$ 37,544,164	\$ 39,158,625
Total liabilities**	\$ 6,981,374	\$ 29,032,558	\$ 31,450,827	\$ 33,420,698	\$ 34,914,414
Total capital and surplus	\$ 4,802,320	\$ 4,306,968	\$ 4,153,636	\$ 4,303,466	\$ 4,244,211
Net cash from operations	\$ 284,954	\$ (573,644)	\$ 947,590	\$ (188,936)	\$ 216,638
Total adjusted risk-based capital	\$ 4,802,320	\$ 4,306,968	\$ 4,153,636	\$ 4,303,466	\$ 4,244,211
Authorized control level risk-based capital	\$ 1,088,668	\$ 1,296,148	\$ 1,326,186	\$ 1,464,758	\$ 1,538,252
Gross written premium	\$ 4,801,836	\$ 6,124,249	\$ 6,927,921	\$ 9,181,074	\$ 15,027,291
Ceded premiums written	\$ 3,841,469	\$ 4,899,399	\$ 5,542,337	\$ 7,344,859	\$ 12,021,833
Premiums earned	\$ 1,121,041	\$ 1,287,117	\$ 1,526,171	\$ 2,406,314	\$ 3,217,951
Net underwriting gain (loss)	\$ 629,592	\$ 221,222	\$ 412,208	\$ (123,738)	\$ 598,848
Net investment income	\$ 127,508	\$ 68,522	\$ 99,548	\$ 213,518	\$ 344,816
Net realized investment gains (losses)	\$ 1,941	\$ -	\$ -	\$ -	\$ -
Net income	\$ 534,587	\$ 154,996	\$ 346,372	\$ 59,255	\$ 624,282
Net underwriting gain to PHS	13.1%	5.1%	9.9%	-2.9%	14.1%
Net written premium to PHS	20.0%	28.4%	33.4%	42.7%	70.8%
Losses and LAE incurred	\$ 336,689	\$ 731,105	\$ 582,216	\$ 1,778,736	\$ 1,993,806
Other underwriting expenses incurred	\$ 154,760	\$ 334,791	\$ 531,747	\$ 751,316	\$ 625,297
Net loss ratio (NEP)	30.0%	56.8%	38.1%	73.9%	62.0%
Expense ratio (NEP)	13.8%	26.0%	34.8%	31.2%	19.4%

**The decrease in assets and liabilities from 2011 to 2010 is primarily due to the early adoption of the Department's requirement to present Losses, Loss Adjustment Expense and Unearned Premium Reserve on a net basis in the statement as opposed to the GAAP presentation used in prior years.

REINSURANCE

Effective October 1, 2008, CARE entered into a quota-share reinsurance agreement under which it ceded 80 percent of its premiums and losses and loss adjustment expenses. The reinsurance agreement is subject to a maximum recovery of 150 percent of reinsurance premium for each year. Each annual period shall run separately on a risk attaching basis commencing at the inception of this agreement and on each anniversary thereafter.

Our review of the Company's ceded reinsurance contract did not disclose any unusual provisions.

During 2011, the Company ceded premiums of approximately \$3.8 million, to AmTrust International, and as of December 31, 2011, the Company report estimated reinsurance recoverable on unpaid losses, and ceded unearned premiums, totaling approximately \$17.3 million and \$2 million, respectively. If the reinsurer was not able to meet its obligations under the treaty, the Company would be liable for any defaulted amounts.

ACCOUNTS AND RECORDS

During the period under examination, the primary locations of the Company's accounting and corporate records were at the office of its captive manager, Risk Services, Barre, Vermont; at the offices of its owner, CPLA, in Louisville, Kentucky; and at the offices of its claims administrator, in Ohio.

The Company's general accounting records consisted of an automated general ledger and various subsidiary ledgers. Our examination did not disclose any significant issues with these records.

STATUTORY DEPOSITS

The Company does not have any statutory deposits in the District of Columbia and is not required to maintain any such deposits. In addition, the Company did not have any other statutory deposits as of December 31, 2011.

FINANCIAL STATEMENTS

The following financial statements were prepared in accordance with accounting practices generally accepted in the United States (“GAAP”), and reflect the financial condition of the Company as of December 31, 2011, as determined by this examination:

<u>STATEMENT</u>	<u>PAGE</u>
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The accompanying Notes to Financial Statements are an integral part of these Financial Statements.

BALANCE SHEET

ASSETS

	<i>December 31, 2011</i>
Bonds	\$ 6,258,685
Commons stocks	947,285
Cash	<u>2,461,503</u>
Subtotals, cash and invested assets	\$ 9,667,473
Investment income due and accrued	34,931
Uncollected premiums and agents' balances in the course of collection	371,322
Reinsurance:	
Amounts recoverable from reinsurers	849,657
Net deferred tax asset	218,412
Aggregate write-ins for other than invested assets:	
Deductible Receivable	223,264
Prepaid Captive Management Fee	48,829
Deferred Policy Acquisition Costs	369,806
Total	<u>\$ 11,783,694</u>

LIABILITIES, SURPLUS AND OTHER FUNDS

	<i>December 31, 2011</i>
Losses (Note 1)	\$ 2,964,575
Loss adjustment expenses (Note 1)	1,358,689
Commissions payable, contingent commissions and other similar charges	412,849
Other expenses (excluding taxes, licenses and fees)	137,333
Taxes, licenses and fees (excluding federal and foreign income taxes)	68,642
Current federal and foreign income taxes (including \$0 on realized capital gains (losses))	128,946
Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$1,957,430 and including warranty reserves of \$0)	484,021
Ceded reinsurance premiums payable (net of ceding commission)	1,009,719
Aggregate write-ins for liabilities	<u>416,600</u>
 Total Liabilities	 \$ 6,981,374
 Common capital stock	 1,000,000
Gross paid in and contributed surplus	1,410,529
Unassigned funds (surplus)	<u>2,391,791</u>
 Surplus as regards policyholders	 \$ 4,802,320
 Totals	 <u><u>\$ 11,783,694</u></u>

STATEMENT OF INCOME

	<i>December 31, 2011</i>
UNDERWRITING INCOME	
Premiums earned	\$ 1,121,041
DEDUCTIONS	
Losses incurred	57,414
Loss expenses incurred	279,275
Other underwriting expenses incurred	154,760
Total underwriting deductions	\$ 491,449
Net underwriting gain	\$ 629,592
INVESTMENT INCOME	
Net investment income earned	\$ 127,508
Net realized capital gain	1,941
Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	\$ 759,041
Federal and foreign income taxes incurred	\$ 224,454
Net income	\$ 534,587

CAPITAL AND SURPLUS ACCOUNT

Surplus as regards policyholders, December 31, 2006	\$ 3,620,714
Net income, 2007	624,282
Change in net unrealized capital gains or (losses) less capital gains tax of \$401	(785)
Net change in surplus as regards policyholders, 2007	623,497
Surplus as regards policyholders, December 31, 2007	\$ 4,244,211
Net income, 2008	59,255
Net change in surplus as regards policyholders, 2008	59,255
Surplus as regards policyholders, December 31, 2008	\$ 4,303,466
Net income, 2009	346,372
Change in net unrealized capital gains or (losses) less capital gains tax of \$1,954	3,798
Surplus adjustments: Paid in	(500,000)
Net change in surplus as regards policyholders, 2009	(149,830)
Surplus as regards policyholders, December 31, 2009	\$ 4,153,636
Net income, 2010	154,996
Change in net unrealized capital gains or (losses) less capital gains tax of (\$857)	(1,664)
Net change in surplus as regards policyholders, 2010	153,332
Surplus as regards policyholders, December 31, 2010	\$ 4,306,968
Net income, 2011	534,587
Change in net unrealized capital gains or (losses) less capital gains tax of (\$20,211)	(39,235)
Net change in surplus as regards policyholders, 2011	495,352
Surplus as regards policyholders, December 31, 2011	\$ 4,802,320

ANALYSIS OF EXAMINATION CHANGES TO SURPLUS

There were no changes to the Company's surplus as a result of our examination.

NOTES TO FINANCIAL STATEMENTS

NOTE 1 – Loss and Loss Adjustment Expense Reserves:

The Company reported “Losses” and “Loss adjustment expense” reserves net of reinsurance totaling approximately \$3 million and \$1.4 million, respectively. These reserves represent management’s best estimate of the amounts necessary to pay all claims and related expenses that have been incurred but are still unpaid as of December 31, 2011.

Reserve credits taken as of December 31, 2011 for cessions to the Company’s reinsurer totaled approximately \$17.3 million. These amounts are reported as a deduction from gross loss and loss adjustment expenses reserves. If the reinsurer was unable to meet its obligations under the reinsurance treaty, the Company would be liable for any defaulted amounts. The Company’s net loss reserves total approximately \$4.4 million.

The methodologies utilized by the Company to compute reserves, and the adequacy of the loss and loss adjustment expenses reserves as of December 31, 2011 were reviewed as part of our examination. As part of our review, we relied on the Company’s independent actuary, who concluded that the reserves on the Company’s books appeared to be sufficient. In addition, as part of our review, we engaged an independent actuary to review the methods employed, assumptions relied upon, and conclusions reached by the Company’s independent actuary. The independent actuary utilized in our examination concluded that the loss reserves reported by the Company as of December 31, 2011 appeared sufficient.

COMMENTS AND RECOMMENDATIONS

During the examination, no issues warranting comments or recommendations in this examination report were noted.

CONCLUSION

Our examination disclosed that as of December 31, 2011 the Company had:

Admitted Assets	\$	11,783,694
Liabilities and Reserves		6,981,374
Common Capital Stock		1,000,000
Gross Paid in and Contributed Surplus		1,410,529
Unassigned Funds (Surplus)		2,391,791
Total Surplus		4,802,320
Total Liabilities, Capital and Surplus	\$	11,783,694

Based on our examination, the accompanying balance sheet properly presents the financial position of the Company at December 31, 2011, and the accompanying statement of income properly presents the results of operations for the period then ended.

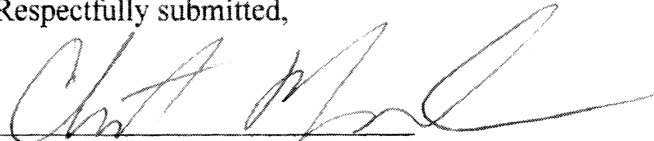
Chapter 39 ("CAPTIVE INSURANCE COMPANIES") of Title 31 ("Insurance and Securities") of the D.C. Official Code specifies the level of capital and surplus required for the Company. We concluded that the Company's capital and surplus funds exceeded the minimum requirements during the period under examination.

SIGNATURES

In addition to the undersigned, the following personnel from Risk & Regulatory Consulting, LLC, representing the Department, participated in this examination as members of the examination team: Connie Ridinger, CFE; Carolyn Maynard, CFE; and Adam M. Sarote, CISA, CGEIT, CRISC.

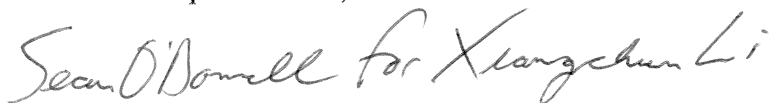
The actuarial portion of this examination was completed by Edward J. Zonenberg, FCAS, MAAA, of Risk & Regulatory Consulting, LLC.

Respectfully submitted,

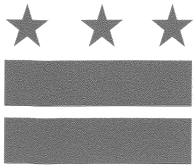


Christopher T. Rushford, CFE
Examiner-In-Charge
Risk & Regulatory Consulting, LLC

Under the Supervision of,



Xiangchun (Jessie) Li, CFE
Supervising Examiner
District of Columbia Department of Insurance,
Securities and Banking



Government of the District of Columbia
Vincent C. Gray, Mayor
Department of Insurance, Securities and Banking



William P. White
Commissioner

May 10, 2013

Daniel L. Hafendorfer, M.D.
President
CARE Risk Retention Group, Inc.
c/o Risk Services, LLC
2233 Wisconsin Avenue, N.W., Suite 310
Washington, DC 20007

RE: Examination of **CARE Risk Retention Group, Inc.**, as of December 31, 2011.

Dear Dr. Hafendorfer:

Pursuant to the provisions of Section 31-1404 of the D.C. Official Code, enclosed is a draft copy of the Report on Examination ("Report") of the affairs and financial condition of CARE Risk Retention Group, Inc. ("Company") as of December 31, 2011.

Please submit, to my attention, a written response calling attention to any errors or omissions. In addition, if this Report on Examination contains a section entitled "Comments and Recommendations" that discloses certain areas requiring action, the Company shall submit a statement covering the corrective measures which will be taken. If the Company's position on any of these points is contrary to the Examiner's findings, an explanation should be submitted covering each contested comment and/or recommendation.

If there are no errors or omissions to be brought to our attention, and there are no "Comments and Recommendations" requiring a response, please submit a statement that the Company accepts the Report.

The response must be in writing and shall be furnished to this Department by June 10, 2013. In addition to a hard-copy response, please also furnish the response electronically via e-mail to me, in a Microsoft "Word" format, to sean.odonnell@dc.gov.

Sincerely,

Sean O'Donnell
Director of Financial Examination,
Risk Finance Bureau

Enclosure

CARE Risk Retention Group, Inc.

**2333 Wisconsin Ave, N.W., Suite 310
Washington, DC 20007**

June 10, 2013

P. Sean O'Donnell
Director of Financial Examination
Risk Finance Bureau
Department of Insurance, Securities and Banking
1400 L Street, N.W., Suite 400
Washington, D.C. 20005

**Re: CARE Risk Retention Group, Inc. ("CARE")
NAIC Company Code: 11825; NAIC Group Code: 0000; FEIN: 52-2395338**

Dear Mr. O'Donnell:

The Company wishes to thank the DISB and the examiners for the Report on Examination of the Company for the period January 1, 2007 through December 31, 2011 forwarded by the Risk Finance Bureau on May 10, 2013.

Thank you. Should you have any further questions, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Halstead-Johnson", with a stylized flourish at the end.

Charles Halstead-Johnson
Risk Services, LLC
As Managers for
CARE Risk Retention Group, Inc.



Government of the District of Columbia
Vincent C. Gray, Mayor
Department of Insurance, Securities and Banking



William P. White
Commissioner

June 13, 2013

Daniel L. Hafendorfer, M.D.
President
CARE Risk Retention Group, Inc.
c/o Risk Services, LLC
2233 Wisconsin Avenue, N.W., Suite 310
Washington, DC 20007

RE: Examination of **CARE Risk Retention Group, Inc.**, as of December 31, 2011.

Dear Dr. Hafendorfer:

We are in receipt of a response, dated June 10, 2013, from Charles Halstead-Johnson of Risk Services, LLC, regarding the Report on Examination of **CARE Risk Retention Group, Inc.** ("Company") as of December 31, 2011. The response is deemed adequate.

The adopted Report (which includes a copy of this letter), and the Order evidencing such adoption are enclosed. Pursuant to Section 31-1404(e)(1) of the D.C. Official Code, the adopted Report will be held private and confidential for a period of 10 days from the date of the Order evidencing such adoption. After this 10 day period has passed, the Report will be publicly available. The Department of Insurance, Securities and Banking will forward the adopted Report electronically to each jurisdiction in which the Company is registered and to the National Association of Insurance Commissioners.

Pursuant to Section 31-1404(d)(1) of the D.C. Official Code, within 30 days of the date of the above-mentioned Order, affidavits executed by each Company director stating under oath that he or she has received a copy of the adopted examination Report and related Order shall be filed with this Department. Please send these affidavits to my attention at the Department.

Please contact me at 202-442-8153 if you have any questions.

Sincerely,

Sean O'Donnell
Director of Financial Examination
Risk Finance Bureau

Enclosures